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Laura Davis Jones

July 13, 2022

302.778.6401 ljones@pszjlaw.com

Via E-mail and First Class Mail

Inga von Seelen Senior Vice President Purchasing Volkswagen Group of America, Inc. inga.vonseelen@vw.com Chattanooga Operations LLC 8001 Volkswagen Drive, Chattanooga, TN 37416 USA

Re: SaarGummi Tennessee Inc.

Dear Ms. Von Seelen:

Due to the continued absence of the necessary cooperation and support from Volkswagen needed to address the problems and issues set forth in my attached letter to you of July 8, 2022 (the "<u>Prior Notification</u>"), SaarGummi Tennessee Inc. ("<u>SaarGummi U.S.</u>") hereby advises Volkswagen that for the reasons set forth in the Prior Notification and on the bases set forth therein, as of Monday, July 18, 2022, SaarGummi U.S. will stop producing and delivering to Volkswagen the sealing systems described in the attached exhibit to the Prior Notification (the "<u>Parts</u>").

Further, SaarGummi U.S. demands that Volkswagen immediately pay \$846,000 U.S. due pursuant to invoice number 90817 for purchase order 6000214496 from February 18, 2022. Regardless of Volkswagen remedying such contributing breach,



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however, SaarGummi U.S. is declaring Force Majeure consistent with the Prior Notification and undertaking the cessation of production and delivery of Parts for the reasons set forth above.

Very truly yours,

/s/ Laura Davis Jones

Laura Davis Jones

Partner

Pachulski Stang Ziehl & Jones LLP

LDJ

Encl.

cc: Richard Mizak (w/encl.) (via email

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